

Appl. No.: 09/418,418
Amdt. dated April 19, 2004
Reply to Office action of February 9, 2004

REMARKS/ARGUMENTS

At the time of the Office action of February 9, 2004, Claims 1-12 and 14-23 were pending in this patent application. Claims 1-12 and 14-23 were rejected on various grounds as discussed below. By this amendment, Claims 1, 11, 15, 20, 21 and 23 have been amended. The Applicants respectfully traverse the rejections as they would apply to the amended claims. Reconsideration is requested.

I. OFFICE ACTION PARAGRAPH 3

The Applicants previously argued that the Chakrabarti reference does not form a set of expert documents from the set of all documents crawled as is done in the present invention. The Examiner found the argument to not be persuasive on the grounds that "forming a set of expert documents from the set of all documents crawled" is not in the claims.

Claim 1, as previously amended included the limitation of "determining which of the hypertext documents are expert documents without reference to the search query." Claims 20 and 21 have the equivalent phrase. The Applicants believe that this step necessarily results in selecting or forming a set of expert documents from the universe of documents crawled. Since the Examiner feels that the wording "forming a set of expert documents from the set of all documents crawled" more accurately describes what was disclosed in the present invention, and the Applicants feel there is no difference in meaning, the claims have been amended to include the wording suggested by the Examiner.

The Applicants submit that the claims as amended clearly include the step of forming a set of expert documents from the set of all documents crawled without reference to a search query and are therefore novel and unobvious over the cited references.

II. OFFICE ACTION PARAGRAPH 4

Claims 1, 20, and 21 were rejected under 35 U.S.C.103(a) as being obvious over Chakrabarti et al. (Automatic resource compilation by analyzing hyperlink structure and associated text, April 14, 1998).

Appl. No.: 09/418,418
Amdt. dated April 19, 2004
Reply to Office action of February 9, 2004

The Examiner alleges that Chakrabarti teaches "determining which of the hypertext documents are expert documents without reference to the search query" (page 3, lines 34-35). The Applicants disagree.

The first step disclosed by Chakrabarti is a topic based search of a collection of pages. In Section 2. Algorithm, Chakrabarti says that "Given a topic, the algorithm first gathers a collection of pages from which it will distill ones that it considers the best for the topic." This collection may be considered a set of expert pages, but are limited to pages which may be considered to be experts on the topic. Chakrabarti explains that the way to form this set is: "The topic is sent to a term-based search engine _ *AltaVista* in our case – and a *root set* of 200 documents containing the topic term(s) is collected." Thus Chakrabarti begins its process with a topic based search. Chakrabarti could not begin the process without the topic, because the first step uses the topic.

In contrast, the presently claimed invention may begin at any time before a topic is submitted for a search. The first step is a preprocessing step to establish a current set of expert pages without reference to a particular topic. This is a distinct advantage of the present invention because it can be performed on a regular basis, e.g., once a day, at a convenient time, e.g., at midnight. The preprocessing step need not be repeated when a specific topic is submitted. Instead, a topic search of the expert pages is performed after the topic is received. The requestor will receive a quality search in a shorter time since the system need not search the entire web every time a topic is submitted.

In view of this clear and unobvious difference and advantage of the present invention, the Applicants submit that the independent Claims 1, 20 and 21 are patentable over the prior art. Since the remaining claims are all dependent claims which further limit Claims 1, 20 or 21, the Applicants submit that the dependent claims are also patentable over the prior art.

III. CONCLUSION

Applicants respectfully request reconsideration and allowance of the pending claims. If the Examiner feels that a telephone conference would

Appl. No.: 09/418,418
Amdt. dated April 19, 2004
Reply to Office action of February 9, 2004

expedite the resolution of this case, he is respectfully requested to contact the undersigned.

In the course of the foregoing discussions, Applicants may have at times referred to claim limitations in shorthand fashion, or may have focused on a particular claim element. This discussion should not be interpreted to mean that the other limitations can be ignored or dismissed. The claims must be viewed as a whole, and each limitation of the claims must be considered when determining the patentability of the claims. Moreover, it should be understood that there may be other distinctions between the claims and the prior art which have yet to be raised, but which may be raised in the future.

Applicants respectfully request that a timely Notice of Allowance be issued in this case. If any fees or time extensions are inadvertently omitted or if any fees have been overpaid, please appropriately charge or credit those fees to Hewlett-Packard Company Deposit Account Number 08-2025 and enter any time extension(s) necessary to prevent this case from being abandoned.

Respectfully submitted,



Jonathan M. Harris
PTO Reg. No. 44,144
CONLEY ROSE, P.C.
(713) 238-8000 (Phone)
(713) 238-8008 (Fax)
ATTORNEY FOR APPLICANTS

HEWLETT-PACKARD COMPANY
Intellectual Property Administration
Legal Dept., M/S 35
P.O. Box 272400
Fort Collins, CO 80527-2400